

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL D. CAUDLE

[DOB: xx-xx-72],

DUSTIN L. GARGES

[DOB: xx-xx-76],

MARSHA R. ERICKSON

[DOB: xx-xx-63],

BRANDI SUE CLARK

a/k/a: **Brandi German**

[DOB: xx-xx-79],

DREW N. TURNER

[DOB: xx-xx-78],

and

JEREMIE S. PALAN

[DOB: xx-xx-77]

) No. 05-03124-01/06-CR-S-GAF

)

)

) COUNT ONE:

) (All Defendants)

) 21 U.S.C. §§ 846 and 841(a)(1) and

) (b)(1)(B)(viii)

) NLT 5 years; NMT 40 years

) and/or \$2 million fine

) Supervised Release: NLT 4 years

)

) COUNTS TWO, THREE AND FOUR:

) (Defendant CAUDLE only)

) 21 U.S.C. § 841(a)(1) and (b)(1)(C)

) NMT 20 years

) and/or \$1 million fine

) Supervised Release: NLT 3 years

)

) COUNTS FIVE AND SIX:

) (Defendant GARGES only)

) 21 U.S.C. § 841(a)(1) and (b)(1)(C)

) NMT 20 years

) and/or \$1 million fine

) Supervised Release: NLT 3 years

)

) COUNTS SEVEN, EIGHT,

) NINE, and TEN:

) (Defendant ERICKSON only)

) 21 U.S.C. § 841(a)(1) and (b)(1)(C)

) NMT 20 years

) and/or \$1 million fine

) Supervised Release: NLT 3 years

)

) COUNT ELEVEN:

) (Defendant CLARK only)

) 21 U.S.C. § 841(a)(1) and (b)(1)(C)

) NMT 20 years

) and/or \$1 million fine

) Supervised Release: NLT 3 years

)

-) COUNT TWELVE:
-) (Defendants CLARK and PALAN only)
-) 21 U.S.C. § 841(a)(1) and (b)(1)(C)
-) and 18 U.S.C. § 2
-) NMT 20 years
-) and/or \$1 million fine
-) Supervised Release: NLT 3 years
-)
-) COUNT THIRTEEN:
-) (Defendant CLARK only)
-) 21 U.S.C. § 841(a)(1) and (b)(1)(C)
-) NMT 20 years
-) and/or \$1 million fine
-) Supervised Release: NLT 3 years
-)
-) COUNT FOURTEEN:
-) (Defendants CAUDLE and PALAN only)
-) 21 U.S.C. § 841(a)(1) and (b)(1)(C)
-) and 18 U.S.C. § 2
-) NMT 20 years
-) and/or \$1 million fine
-) Supervised Release: NLT 3 years
-)
-) COUNTS FIFTEEN, SIXTEEN and
-) SEVENTEEN:
-) (Defendant TURNER only)
-) 21 U.S.C. § 841(a)(1) and (b)(1)(C)
-) NMT 20 years
-) and/or \$1 million fine
-) Supervised Release: NLT 3 years
-)
-) COUNT EIGHTEEN:
-) (Defendant TURNER only)
-) 21 U.S.C. § 841(a)(1) and (b)(1)(B)
-) NLT 5 years, NMT 40 years
-) and/or \$2 million fine
-) Supervised Release: NLT 4 years
-)
-) COUNT NINETEEN:
-) (Defendant TURNER only)
-) 18 U.S.C. § 922(g)(3)
-) NMT 10 years
-) and/or \$250,000 fine
-) Supervised Release: NMT 3 years
-)

) COUNT TWENTY:
) (Defendants CAULDE and PALAN only)
) 21 U.S.C. § 853
) Criminal Forfeiture
)
) \$100 Mandatory Special Assessment
) on All Counts

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Beginning on an unknown date, but commencing at least as early as January 2002, and continuing to on or about August 1, 2005, in Greene County, in the Western District of Missouri, and elsewhere, MICHAEL D. CAUDLE, DUSTIN L. GARGES, MARSHA R. ERICKSON, BRANDI SUE CLARK (a/k/a, BRANDI GERMAN), DREW N. TURNER, and JEREMIE S. PALAN, defendants, did knowingly and intentionally conspire and agree with each other and with other persons known and unknown to the Grand Jury, to distribute in excess of 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, the distribution of which is a felony in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(viii); all in violation of Title 21, United States Code, Section 846.

COUNT TWO

On or about July 12, 2004, in Greene County, in the Western District of Missouri, MICHAEL D. CAUDLE, defendant, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THREE

On or about August 24, 2004, in Greene County, in the Western District of Missouri, MICHAEL D. CAUDLE, defendant, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOUR

On or about August 26, 2004, in Greene County, in the Western District of Missouri, MICHAEL D. CAUDLE, defendant, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIVE

On or about September 13, 2004, in Greene County, in the Western District of Missouri, DUSTIN L. GARGES, defendant, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIX

On or about September 14, 2004, in Greene County, in the Western District of Missouri, DUSTIN L. GARGES, defendant, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SEVEN

On or about September 7, 2004, in Greene County, in the Western District of Missouri, MARSHA R. ERICKSON, defendant, did knowingly and intentionally distribute a mixture or

substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHT

On or about September 9, 2004, in Greene County, in the Western District of Missouri, MARSHA R. ERICKSON, defendant, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT NINE

On or about September 16, 2004, in Greene County, in the Western District of Missouri, MARSHA R. ERICKSON, defendant, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TEN

On or about October 13, 2004, in Greene County, in the Western District of Missouri, MARSHA R. ERICKSON, defendant, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT ELEVEN

On or about June 22, 2005, in Greene County, in the Western District of Missouri, BRANDI SUE CLARK (a/k/a, Brandi German), defendant, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWELVE

On or about June 20, 2005, in Greene County, in the Western District of Missouri, BRANDI SUE CLARK (a/k/a, Brandi German) and JEREMIE S. PALAN, defendants, aided and abetted by each other, did knowingly and intentionally distribute in a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT THIRTEEN

On or about March 6, 2005, in Greene County, in the Western District of Missouri, BRANDI SUE CLARK (a/k/a, Brandi German), defendant, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOURTEEN

On or about March 6, 2005, in Greene County, in the Western District of Missouri, MICHAEL D. CAUDLE and JEREMIE S. PALAN, defendants, aided and abetted by each other, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FIFTEEN

On or about September 14, 2004, in Greene County, in the Western District of Missouri, DREW N. TURNER, defendant, did knowingly and intentionally distribute a mixture or

substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIXTEEN

On or about September 20, 2004, in Greene County, in the Western District of Missouri, DREW N. TURNER, defendant, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SEVENTEEN

On or about September 21, 2004, in Greene County, in the Western District of Missouri, DREW N. TURNER, defendant, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHTEEN

On or about April 25, 2005, in Greene County, in the Western District of Missouri, DREW N. TURNER, defendant, did knowingly and intentionally possess with intent to distribute in excess of 50 grams of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT NINETEEN

On or about September 28, 2004, in Greene County, in the Western District of Missouri and elsewhere, DREW N. TURNER, defendant, while using and addicted to methamphetamine, a Schedule II controlled substance, did knowingly possess, in and affecting commerce, a firearm, that is, a Hi-Point .45 caliber pistol, in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

COUNT TWENTY

As a result of committing the controlled substance offense alleged in Count One of this Indictment, defendants MICHAEL D. CAUDLE and JEREMIE S. PALAN shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting and derived from any proceeds the said defendants obtained directly and indirectly as a result of the said violation and any and all property used and intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count One of this Indictment, including but not limited to the following:

Approximately \$3,600.00 in United States currency seized from the defendants on March 6, 2005,

all in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 853.

A TRUE BILL.

/s/
FOREPERSON OF THE GRAND JURY

/s/
KIMBERLY R. WEBER DEAN
TX Bar #24030672 and AR Bar #94207
Special Assistant United States Attorney